

1 The Honorable James L. Robart
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 AMAZON.COM, INC., a Delaware corporation,
10 AMAZON.COM SERVICES LLC, a Delaware
11 limited liability company, and AMAZON
12 TECHNOLOGIES, INC., a Nevada corporation,
13

Plaintiffs,

v.

14 Does 1-20, unknown parties doing business as
15 “REKK,” and the following individuals: Oscar
16 Pineda, Janiyah Alford, Noah Page, Skylar
17 Robinson, William Walsh, Luke Colvin,
18 Alejandro Taveras, Andrew Ling, Brandon
19 Sukhram, Charalampos Gkatzoulas, Cosmin
20 Sopca, Dylan Hinz, Eric Niezabytowski, Graham
Ferguson, Ivona Brazovskaja, James Garofalo,
Jenny Tran, Johanes Kessel, Jorge Correa, Josh
Davis, Karcper Niepogoda, Olaf Booij, Ryan
Bates, Sai Charan Beeravelli, Simone Antonio
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT
INJUNCTION AS TO
DEFENDANT JAMES
GAROFALO AND PROPOSED
ORDER

NOTED FOR CONSIDERATION:
February 16, 2024

Without Oral Argument

24 **STIPULATION**

25 Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,
26 Inc. (together, “Amazon”), and Defendant James Garofalo (“Garofalo”) and (collectively
27 “Settling Parties”), by and through Amazon’s respective counsel of record and by Garofalo’s

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1 pro-se representation, notify the Court that the Settling Parties have reached a settlement of all
2 claims between them in this matter. Pursuant to the terms of that settlement, the Settling Parties
3 stipulate and agree to entry of the permanent injunction below.

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1 DATED this 16th day of February, 2024.

2 Davis Wright Tremaine LLP
3 *Attorneys for Plaintiffs*

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Defendant

By s/ 
7C6DE56629454CE
James Garofalo
Phone: 937-789-4042
Email: jamesgarofalo1986@yahoo.com

12 **PERMANENT INJUNCTION**

13 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that
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15 Defendant James Garofalo, and his respective employees, agents, successors and assigns, and all
16 others in active concert or participation with him, are permanently enjoined and restrained from:

17 1. Accessing and using, whether directly or indirectly via a third party, intermediary,
18 or proxy, Amazon.com, or any other Amazon online store around the world;

19 2. Exploiting or abusing Amazon's ordering or return services;

20 3. Making false statements or misrepresentations to Amazon;

21 4. Engaging in any activity that defrauds Amazon into paying money or providing
22 replacement products for illegitimate returns;

23 5. Engaging in any scheme or malicious activity that interacts with Amazon; and

24 6. Knowingly and materially assisting or engaging any other person or business
25 entity in engaging in or performing any of the activities listed above.

The Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent Injunction.

IT IS SO ORDERED.

DATED: February 20, 2024



The Honorable James L. Robart
UNITED STATES SENIOR DISTRICT JUDGE